

Exhibit E

Declaration of Marie E. Casciari

THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

N.C., individually and on behalf of A.C., a
minor,

Plaintiffs,

vs.

PREMERA BLUE CROSS,

Defendants.

Case No. 2:21-cv-01257 - JHC

**DECLARATION OF MARIE E.
CASCIARI**

DECLARATION OF MARIE E. CASCIARI

1. I am an attorney over the age of 18 years, a member of good standing of the Illinois and Washington State Bars, am competent to provide this testimony, and have personal knowledge of the matter on which I am testifying.

2. I am making this declaration in support of Plaintiff's request for attorneys' fees in the instant case.

1 3. I primarily practice law in Chicago, Illinois, and Seattle, Washington, although my
2 practice extends throughout the United States.

3 4. I received my J.D. from Loyola University Chicago School of Law in May 2011. I
4 was admitted to practice law by the Supreme Court of Illinois in November 2011. I subsequently
5 became a member of the Washington State Bar in September 2021.

6 5. I have additionally been admitted to practice before The United States Court of
7 Appeals for the Seventh Circuit; and the United States District Courts for the Northern District of
8 Illinois, Eastern District of Wisconsin, and Western District of Washington.

9 6. Throughout my career, I have concentrated my practice solely on representing
10 individuals with employee benefit claims governed by the Employee Retirement Income Security
11 Act of 1974 (“ERISA”) and other individual insurance claims, primarily focusing on health, life,
12 and disability benefit claims. I have also represented individuals alleging violations of the federal
13 Mental Health Parity and Addiction Equity Act (“MHPAEA”).

14 7. I have represented hundreds of individuals at all stages of the claim process,
15 including consulting with them as they are applying for benefits and putting together initial claim
16 submissions; managing active claims; preparing internal pre-litigation appeals for denied claims;
17 and challenging benefit denials in litigation in Federal District and Circuit Courts throughout the
18 country.

19 8. I have been named a Super Lawyers Rising Star in Employee Benefits Law every
20 year since 2016.

1 9. I have presented at nearly 40 professional seminars on ERISA, MHPAEA, and other
2 benefits-related issues for various professional organizations, including the ABA, the Practising
3 Law Institute (“PLI”), and the Kennedy Forum.

4 10. I have been a contributing author and chapter editor of the Bloomberg BNA
5 Employee Benefits Law Treatise from 2014 to 2022. I have published another half dozen ERISA-
6 related articles in various other bar association and professional legal organization publications.

7 11. Since September 2022, I have also served as Co-Chair of the American Bar
8 Association (“ABA”) Labor & Employment Law Section’s Employee Benefits Committee.

9 12. Most of my legal work is performed on a contingency fee basis, although I also
10 regularly consult with and perform legal services on behalf of clients on an hourly fee basis.

11 13. Few attorneys specialize in representing ERISA claimants throughout the country,
12 and there are even fewer in Seattle. The ERISA statute is a particularly complex federal law, which
13 contains strict pre-litigation claims procedures before a claim denial can even be challenged in
14 court. The claim files are often voluminous, making these cases extremely factually involved. In
15 addition, because this is a federal statute, ERISA attorneys must constantly stay abreast of new
16 cases as they are decided around the country.

17 14. I have known Brian S. King for most of my legal career. I am familiar with his
18 experience, reputation, and skills as an attorney representing ERISA claimants in courts throughout
19 the country. I am aware that the current hourly rate he is charging clients for his legal services is
20 \$600.00.

21 15. In my experience and judgment, based on my personal knowledge and familiarity
22 with hourly rates charged by other ERISA attorneys throughout the country, which I regularly
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1 survey based on my review of the Benefits Law360 daily newsletter, familiarity with new ERISA
2 cases published on Lexis and/or Westlaw, and my role as Co-Chair of the ABA Labor &
3 Employment Law Section's Employee Benefits Committee, the hourly rate of \$600.00 for an
4 attorney with Mr. King's level of experience, specialization, knowledge, and reputation is an
5 extremely reasonable rate. I hold that opinion to a reasonable degree of professional certainty.

6 16. I have not been paid for nor expect to receive any compensation for furnishing this
7 declaration.

8 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
9 and correct.

10 Executed on: June 7, 2023

/s/ Marie E. Casciari

11 Marie E. Casciari
12 **DEBOFSKY LAW, LTD.**
13 3101 Western Ave, Suite 350
14 Seattle, WA 98121
15 Tel. (206) 333-2696
16 Fax (312) 600-4426
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